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[To be used when required by Administrative Order No. 2 (g)*]

COURT: CIRCUIT COURT OF MARION COUNTY

Docket/Case Number: 45CR-25-103, 45CR-25-111, 45CR-25-118, 45CR-25-117, 45CR-25-82

CASE NAME:

PLAINTIFF/

PETITIONER: STATE OF ARKANSAS

DEFENDANT/

RESPONDENT: STEVEN MANSON JR

TITLE OF PLEADING OR
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(If a multi-part file,
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AFFIDAVITS OF BOTH WITNESSES

*Administrative Order No 2.

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IN THE CIRCUIT COURT OF MARION COUNTY, ARKANSAS
CRIMINAL DIVISION – 3RD DIVISION

STATE OF ARKANSAS

PLAINTIFF

v. No. 45CR-25-103, 45CR-25-111, 45CR-25-118,
45CR-117, 45CR-25-82

STEVEN MANSON

DEFENDANT

AFFIDAVIT OF DEZARAE KENNEDY

Comes now, Dezarae Kennedy, being first duly sworn, state as follows:

1. I am over the age of eighteen (18) and competent to testify in this matter. The facts in this Affidavit are based on my personal knowledge.
2. I am the daughter of Amber Manson (“my mother” or “Amber”). I make this Affidavit to describe my experiences growing up with her and to respond to the allegations she has made against Steven Manson Jr., regarding the events in November 2025 and December 2025.

BACKGROUND WITH MY MOTHER

3. I was born on May 2nd, 2006. Within the first week of my life, my Aunt Sherry (Cheryl Wicker) (“Aunt Sherry”) had to take me and care for me because my mother was using drugs and was mentally unstable to care for me.
4. From infancy until about age five (5), Aunt Sherry raised me, fed me, taught me basic things. My mother did not regularly visit or function as my caregiver/mother.
5. When I was about five (5), my mother suddenly appeared at Aunt Sherry’s home, took me, and refused to return me, even though I was safe with Aunt Sherry and wanted to be with Aunt Sherry.

6. After that, I lived with my mother in various apartments. The conditions were often filthy, filled with trash and bugs, and I frequently went hungry. My mother rarely bought or prepared food for me, and I relied heavily on school meals.
7. Throughout my childhood, my mother heavily used drugs (including cocaine and pills) and was frequently angry and unpredictable. She told me more than once that she wished that I were dead and threatened to crash the car on my side of the vehicle.
8. My mother had a series of boyfriends (including men named Chris, Leroy, Mark, and Bruce) who engaged in drugs and alcohol. Several of them were verbally and physically abusive towards me. My mother did not protect me and often chose them and their habits over my safety and basic needs.
9. When my mother had friends over, I was often confined to my room, and punished if I came out, even to use the bathroom. At times, I had to use a cup in my room and dump it out the window because I was not allowed to leave my room.
10. As I grew older, my mother demanded that I be a slave for her by waiting on her hand and foot. I was scared if I did not comply.

MY MOTHER'S VIOLENCE AND DISHONESTY TOWARD HUMANS

11. At family holidays, I witnessed my mother physically attacking family members. The police were called, and my mother claimed my uncle was attacking my mother, even though I saw the entire incident.
12. My mother has a pattern of falsely accusing others. For example, when I was residing with Steve's family, she told people I wanted to kill myself and hurt others. This was not true, but I was sent to a mental hospital for several weeks and forced to take medication because of her statements.
13. On or about June 22, 2023, my mother was arrested after she verbally attacked and refused to cooperate with police officers. She was charged with resisting a police officer, criminal trespass, and obstructing a police officer. My understanding is that she pled guilty to two of these charges.

MOVED TO RIVERTON, ILLINOIS AND FORCED PILL INCIDENT

14. On Or about November 2023, Steve bought a house in Riverton, Illinois, where we all moved, including Dalice and I.
15. After moving to Riverton, Illinois, my mother was not taking her prescribed mental health medications, and her behavior was erratic majority of the time.
16. My mother and I would argue time and time again, and I would beg her to take her medicine because she very crazy and unpredictable.
17. In response, my mother locked me in my basement bedroom, forced my mouth open, and made me swallow a large quantity of different pills. I believed she was trying to make me overdose.
18. After she left and locked the door, I drank tons of water and vomited most of the pills, before falling asleep. I later woke up when Steve and Dalice came in and told me we were leaving to pick up Steve and bring him back to our house in Riverton, Illinois.

JULY 2024 – DRURY INN INCIDENT AND RETURN

19. Around the Fourth of July 2024, my mother decided she wanted to leave Steve and take Dalice for good.
20. She stole a significant amount of money from Steve and checked into the Drury Inn Hotel in Springfield, Illinois.
21. Within a couple of days, she called repeatedly, saying she had made a mistake, wanted to come back, and that Dalice needed a safe place. We allowed my mother and Dalice to return to the Riverton house, although she and Steve were no longer in a relationship, so that Dalice would have a stable environment.

MOVE TO YELLVILLE, ARKANSAS 2024

22. In August 2024, Steve and our family moved from Riverton, Illinois, to Yellville, Arkansas.

NOVEMBER 20, 2025 – SALEM GOAT AND SHEEP AUCTION

23. On or about November 20, 2025, Steve's health was poor, so he and my mother stayed in a hotel in Eureka Springs, Arkansas, so he could rest, and she could monitor him.
24. The same day, I, Dalice, and Steve went from our home in Yellville to a goat and sheep auction in Salem. We left around 11:30AM and arrived about 1:00PM the same day.
25. We bought approximately twelve (12) goats and sheep and had to make two (2) trips back to transport them home because there were only two cages in the truck. Dalice helped handle the animals because she loves working with them.
26. We finally returned home about 10:00PM, unloaded the animals, and went to bed because we were exhausted and had to get up early to care for them.
27. Based on my own personal knowledge, Dalice, Steven, and I were together or in close proximity the entire day and evening. To my knowledge, there was no opportunity for Steven to have raped Dalice on or about November 20, 2025, as my mother later claimed.

DECEMBER 3-4, 2025 – GOAT SALE TRIP AND MY MOTHER'S ALLEGATIONS

28. By December 3, 2025, we were living in Yellville, and had no water because the well pump had failed, making it difficult to butcher animals.
29. On December 3, 2025, my mother and Steve spent most of the day butchering three (3) goats at our home in Yellville. Once they were processed, Steve put the meat in buckets in the bed of the truck and sent the buyers a photo about 5:00PM.
30. My mother and Steve then drove to Springfield, Missouri, arriving around 6:54PM, sold the goats, and drove back toward Yellville to get clean clothes.

31. After that, they came to the hotel in Eureka Springs where I was staying so they could shower, since there was no water at home. They arrived around midnight. My mother and Steve then went to bed.
32. On the morning of December 4, 2025, my mother and Steve woke around 7:00AM and left the hotel to return home in Yellville, Arkansas to care for the animals and address the well issue.
33. When they arrived, Steve Jr. went inside to take a short nap while Steven Sr. went outside to feed and water the animals.
34. While Steve Jr. was napping and Steve Sr. was taking care of the animals, my mother took all of our truck keys, all of our money and cards, and our brand-new truck. She removed Daisy, Steve Jr.'s dog, from the new truck, placed the dog in another truck, and then drove off with Dalice in the new truck.
35. We later learned that my mother drove to the police station and accused Steve Jr. of (a) pointing a gun at her and Dalice during an argument on December 3, 2025, and (b) raping Dalice on or around November 20, 2025.
36. Based on my own personal knowledge, my mother's claim that Steven pointed a shotgun at her and Dalice on December 3, 2025, did not happen and is inconsistent with her behavior. If she had truly been threatened with a gun that day, it does not make sense that she would voluntarily:
 - a. Ride with him to Springfield, Missouri;
 - b. Ride back with him from Springfield, Missouri; and
 - c. Go with him to a hotel overnight and sleep in the same place.
37. Based on my own personal knowledge of November 20, 2025, my mother's allegations that Steven raped Dalice is also inconsistent with what actually happened. On that day, my mother and Steve Sr. were in a hotel in Eureka Springs, while I, Dalice, and Steve Jr. spent the entire day traveling to and from Salem, buying goats, and sheep, and then unloading the animals late into the night before going straight to bed.

38. Throughout my life, my mother has repeatedly shown unstable, aggressive, and dishonest behavior, often related to her drug and alcohol use and failure to take prescribed mental health medications. She has falsely claimed others were violent toward her and falsely claimed I was suicidal and dangerous, resulting in my hospitalization.

39. Based on my experiences and my personal knowledge of the events described above, I do not believe the allegations my mother has made against Steven concerning November 20, 2025 and December 3, 2025, are truthful.

40. I make this Affidavit to state the truth about my upbringing to show my mothers patterns and behaviors, and about the events of November 20, 2025, December 3, 2025, and December 4, 2025, as I personally was there and experienced them.

I declare under penalty of perjury under the laws of the State of Arkansas that the foregoing is true and correct, dated this 17 day of December, 2025.

Dezarae

ID: DwgqvE7hpVK7rSt5TdqlWhDmls

Dezarae Kennedy

State of Arkansas)
County of Faulkner)

Subscribed and sworn to before me, a Notary Public within and for the county aforesaid, duly commissioned and acting, the 17th day of December, 2025.



Holly T. Moore
Notary Public

My Commission Expires: 10-19-2032

Respectfully submitted,

/s/ Eugene P. Clifford

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/s/Jack Lofton

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy was emailed and faxed to the Prosecuting Attorney on this date of filing.

/s/ Eugene Clifford

Eugene Clifford

/s/Jack Lofton

Jack Lofton

IN THE CIRCUIT COURT OF MARION COUNTY, ARKANSAS
CRIMINAL DIVISION – 3RD DIVISION

STATE OF ARKANSAS

PLAINTIFF

v.

No. 45CR-25-103, 45CR-25-111, 45CR-25-118,
45CR-117, 45CR-25-82

STEVEN MANSON

DEFENDANT

AFFIDAVIT OF STEVEN MANSON SR.

Comes now, Steven Manson Sr., being first duly sworn, state as follows:

1. **Identity and competency.** I am over the age of eighteen (18) and competent to testify in this matter. The facts in this affidavit are based on my personal knowledge.
2. **Family relationships.** My son is Steven Manson Jr. (“Steve Jr.”). In or around 2022, I was caring for my grandmother.
3. **Hiring Amber as caregiver.** In or around 2022, while I was caring for my grandmother, I met and hired Amber Manson (“Amber”) to assist as my grandmother’s caretaker so that I could return to work and financially support my household and grandmother. After Amber began working as a caregiver, my son, Steve Jr., met Amber, and they quickly began a romantic relationship.
4. **Dalice moves in with me.** Within approximately the first week of Steve Jr. and Amber’s relationship, Amber’s youngest child, Dalice Kennedy (“Dalice”), came to live with me, and I assumed day-to-day responsibility for her. Dalice had to change schools as a result of moving in with me.
5. **Dezarae constantly left alone; moves in with me.** At or about that time, Amber’s oldest daughter, Dezarae Kennedy (“Dezarae”), who was approximately sixteen (16) years old, was left alone all of the time in Amber’s apartment. After some time, Dezarae moved in with me.

6. **Amber's son Dominik.** Amber also has a son, Dominick Kennedy ("Dominick"). To my knowledge, Dominick has never lived with Amber, and other family members cared for him because Amber was mentally unstable and involved with drugs and alcohol.
7. **My day-to-day care for Amber's children.** While Dalice (and later Dezarae) lived with me, I provided daily care and supervision, including but not limited to:
 - a. walking Dalice to the bus stop and picking her up each day;
 - b. assisting with homework;
 - c. teaching her how to ride a bike; and
 - d. spending time with her outdoors (flying kits and fishing).
8. **Amber gets rid of her apartment; living arrangements.** After Dezarae moved in with me, Amber eventually got rid of her apartment and then moved in with my son, Steve Jr., while her daughters were still in my care.
9. **Ambers limited contact with her children.** Amber would stop by only occasionally. She would claim it was to see the children, but in reality it was to drop off her laundry and then leave.
10. **Dezarae begging for her mother's love; mental hospital incident.** Dezarae would call Amber from time to time asking her to come spend time with her. Amber because tired of these calls and wanted to teach Dezarae a lesson by sending her to a mental hospital.
11. **Easter 2023 incident at my home.** On or about Easter, April 2023, Amber came to my home in a manic state; yelling, screaming, and demanding that she take her children with her. I refused because I knew she was not taking her prescribed mental health medication.
12. **Amber's June 2023 arrest at my home.** In or around June 2023, police were called to my home, and Amber was arrested there. It's my understanding that Amber was arrested on one count of resisting a police officer, one count of criminal trespass, and two counts of obstructing a police officer.
13. **Riverton, Illinois residence (November 2023).** In or around November 2023, Steve Jr. purchased a house in Riverton, Illinois, where Steve Jr., Amber, and both stepdaughters all moved into together.

- 14. Reports of Amber's behavior; I move in.** After they moved into the Riverton home, I received calls from Steve Jr. and Dezarae stating that Amber was acting erratically and was not taking her medication. Dezarae also shared with me that her mother, Amber, attempted to overdose Dezarae by forcing pills down her throat. Because of these events and concerns, I decided to move into the Riverton home with Steve Jr., Dezarae, Dalice, and Amber.
- 15. Amber leaving with money and Dalice; Drury Inn in Springfield, Illinois.** While we lived together, Amber would frequently become manic and take the family's money and take Dalice to the Drury Inn in Springfield, Illinois, and then call to say she was leaving "for good." When she ran out of money, she would call and ask to return. Steve Jr. and the household allowed her to return because they did not want her to be homeless.
- 16. Move to Yellville, Arkansas.** After that, Steve Jr. and Amber moved to Yellville, Arkansas, where they started a farm. As the months passed, Amber's behavior, in my observation, became worse.
- 17. Goat sale trip; motel due to no water.** In or around December 2025, Steve Jr. sold three (3) goats. Steve Jr. later discovered he needed to butcher the goats for the buyer and to drive them to Springfield, Missouri. We have text messages that reflect the timeline of these events. After Steve Jr. and Amber returned home from the sale, Steve Jr. was covered in animal blood and needed to shower, but the well stopped working at the house and there was no water. Steve Jr. and Amber went to a motel to get cleaned up.
- 18. Last time I saw Dalice; police surround the home.** The next morning, Steve Jr. and Amber returned to help care for the animals. While I was outside with Dalice feeding the animals, Amber called for Dalice, and that was the last time I saw Dalice. Approximately two hours later, the house was surrounded by tons of police officers. Police stated they were looking for my son.
- 19. Amber's allegation to police; police did not interview me.** When Steve Jr. was located, I learned that Amber reported to police that on December 4, 2025, Steve Jr. allegedly held Amber and Dalice at gunpoint and kidnapped them. I was present in the home during the relevant time period, and law enforcement did not interview me.

20. Auction/stockyard timeline (December 4, 2025). On or about December 4, 2025, Steve Jr., Dezarae, and Dalice went to an auction at the Salem Stockyard, arriving at approximately 1:00PM. They purchased multiple animals, and it took two (2) trips to transport the animals home, making it a long day with repeated travel back and forth. Dezarae was around and with Dalice the entire time.

21. Amber steals my truck and property. On our about December 4, 2025, Amber took my truck without my permission and also took all keys to every vehicle I own and all of the money we had, as well as my ID cards, debit cards, food stamps, and credit cards. To date, I still have not received my personal property back from Amber.

I declare under penalty of perjury under the laws of the State of Arkansas that the foregoing is true and correct, dated this 18 day of December, 2025.



18 ALFmHmWUJGPWQWAdZEUet5h

Steven Manson Sr.

State of Arkansas)
County of Paulkner)

Subscribed and sworn to before me, a Notary Public within and for the county aforesaid, duly commissioned and acting, the 17th day of December, 2025.



Holly J. Moore
Notary Public

My Commission Expires: 10-19-2032

Respectfully submitted,

/s/ Eugene P. Clifford

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy was emailed and faxed to the Prosecuting Attorney on this date of filing.

/s/ Eugene Clifford

Eugene Clifford

/s/Jack Lofton

Jack Lofton